

SBC Illinois' economic expert, Dr. John Haring, addresses this issue in more detail in his rebuttal testimony.

Q. Have CLECs deployed loops to buildings in Illinois with less than \$50,000 in telecom spend?

A. Yes, and to quite a few locations. On Attachment RLS-8, I show several locations in Illinois to which at least one CLEC has built loop facilities that have an annual telecom spend of \$50,000 or less. The loop deployment information displayed on this Attachment is from CLEC discovery responses and shows that CLECs have deployed high-capacity loops to about 90 buildings in the state with less than \$50,000 in annual telecom spend. This data indicates to me that CLECs can and do deploy their own loop facilities at the \$50,000 telecom spend level.

Attachment RLS-8 also shows the roughly 120 locations in Illinois to which at least one CLEC has built loop facilities that have an annual telecom spend of *\$150,000* or less (i.e., Staff's recommended threshold.) This shows that \$150,000 is too high because many, many CLECs deploy loops to buildings with an annual telecom spend level well below \$150,000.

Q. Are there other reasons why you disagree with a \$150,000 telecom spend threshold?

A. Yes. Even if the Commission were to find that the threshold revenue had to be sufficient to support more than one carrier (and it should not), \$150,000 would still be too high for several reasons. First, the loop deployment costs identified by Mr. Wardin are over-

808 stated because he assumed that a CLEC deploys conduit on its own. In fact, CLECs
809 commonly cooperate in constructing conduit into a building. As Mr. Giovannucci
810 explains, "AT&T often engages in joint builds with other CLECs in order to share the
811 high fixed costs of construction." (lines 184-185.) Attached as Attachment RLS-9 are
812 two engineering drawings showing that AT&T, MCI, XO and Looking Glass are joint
813 owners of conduits into buildings at 150 S. Wacker and 100 S. Wacker. Second, Mr.
814 Wardin's TELRIC study included the cost of constructing conduit, so the assumption was
815 that the CLEC would bear the cost of constructing its own conduit. In fact, CLECs can
816 readily obtain conduit from SBC Illinois at very cheap rates.

817
818 Third, as Mr. Sanders testifies at lines 613-614 of his direct, a large portion of the capital
819 costs are attributable to electronics that are re-deployable. Because those assets can be
820 redeployed, it is easier for a CLEC to economically justify deployment of loop facilities
821 to a building. Fourth, the Cambridge study calculates that a CLEC would need about
822 \$44,000 in annual revenues to cover the \$130,000 cost of loop deployment. Mr.
823 Wardin's Illinois-specific TELRIC study shows that the real TELRIC cost of loop
824 deployment is \$60,500 – not \$130,000. Accordingly, a CLEC would require far less than
825 the \$44,000 in annual revenue that the Cambridge study calculates to justify loop
826 deployment. Finally, SBC Illinois' analysis of the economics of loop deployment did not
827 consider the fact that CLECs benefit in other ways from loop deployment, e.g., saving on
828 access charges they would otherwise pay the incumbent for access to the local network.
829 Discovery responses received from both *****BEGIN HIGHLY CONFIDENTIAL*****
830 *******END HIGHLY CONFIDENTIAL***** reveal that those carriers

consider and give great weight to access charge saving in determining whether to deploy loop facilities to a location.

Q. Please provide more information about the loop deployment criteria used by CLECs.

A. Attachments RLS-10 and RLS-11 are documents from *****BEGIN HIGHLY**

CONFIDENTIAL*****

***** END HIGHLY CONFIDENTIAL*****

854 **Q. Can you please clarify how the Cambridge study and Mr. Wardin's TELRIC study**
855 **relate to each other and to SBC Illinois' potential deployment case?**

856 A. SBC Illinois introduced the Cambridge not for the cost component, but primarily because
857 it showed a conservative calculation of the amount of revenue a CLEC needs to justify
858 loop deployment. The Cambridge study, of course, also has an estimate of the costs of
859 loop deployment, which is in the neighborhood of \$130,000. Mr. Wardin testifies that
860 the TELRIC costs of deploying a lateral are roughly \$60,500. This establishes two
861 points: 1) it introduces Illinois-specific costs; and 2) it shows that the costs estimate in the
862 Cambridge study (which was for an entire loop – not just for a lateral) was on the high
863 side.¹¹

864

865 **Q. Mr. Staranczak (line 328) testifies that there are 100 locations that satisfy Staff's**
866 **criteria. Have you attempted to verify that number?**

867 A. Yes, and I find that the number of locations that satisfy Staff's criteria is actually 357. I
868 have identified these locations on Attachment RLS-12. Each of these locations has over
869 \$150,000 in "telecom spend" and is within 300 feet of two alternative providers' facilities
870 or is within 300 feet of one alternative providers' facilities and are already served by one
871 alternative provider.

872

873 **Q. Have you been able to determine why Staff came up with 100 locations?**

874 A. Apparently, there was some confusion with the data request responses submitted by SBC
875 Illinois. In data request GS 1.03(e), Staff asked SBC Illinois to identify the number of
876 locations that have over \$100,000 in "telecom spend" and are within 300 feet of two
877 alternative providers' facilities or are within 300 feet of one alternative providers'
878 facilities and are already served by one alternative provider. SBC Illinois provided its
879 response in two separate spreadsheets and stated this clearly in its response (one
880 spreadsheet to address buildings within 300 feet of two fiber facilities, the other to
881 address the buildings within 300 feet of one fiber facility and already served by another
882 carrier.) It appears that Staff did not look at both spreadsheets and this accounts for the
883 discrepancy.

884
885 **Q. Does Staff recommend that the Commission make a finding of non-impairment at**
886 **all the locations on its list?**

887 A. Mr. Staranczak stops just short of this because he acknowledges that some CLECs may
888 yet produce credible evidence that loop deployment cannot happen at specific locations
889 on the list. (lines 333-339.) While I agree that this is theoretically possible, no CLEC
890 has done so yet. If a CLEC produces such evidence in its rebuttal testimony, SBC Illinois
891 will do its best to respond to that evidence, but of course that evidence should have been
892 produced in direct testimony.

¹¹ A loop is the facility from the central office to the customer premises. A lateral is the much shorter piece from the

Q. Do you present other scenarios of potential outcomes?

A. Yes. While SBC Illinois strongly believes that its proposal most reasonably implements the FCC's potential deployment rules, I recognize that it would be helpful to the Commission to see how many buildings would be included on a potential deployment list if some of the threshold criteria were changed. To that end, I present the number of buildings that would be included in a non-impairment finding under four separate scenarios. I have already discussed the first two scenarios, i.e., the SBC Illinois proposal (Attachment RLS-6) and the Staff proposal (Attachment RLS-12.)

The next two scenarios are variants on the Staff proposal that are created by reducing the telecom spend threshold to \$100,000 (Attachment RLS-13) and then further reducing the telecom spend threshold to \$50,000 (Attachment RLS-14.) For each of these additional scenarios, all buildings are within 300 feet of two CLEC backbone fibers

The results of these four scenarios are as follows:

| # of Providers Within 300 feet | Telecom Spend | Result |
|--------------------------------|---------------|--------|
| 1 | \$50,000 | 653 |
| 2 | \$50,000 | 627 |
| 2 | \$100,000 | 436 |
| 2 | \$150,000 | 357 |

fiber in the street to the customer premises. Mr. Wardin used an average length of 500 feet, a number

914

915 **Q. How do you respond to the CLEC's argument that the potential deployment**
916 **analysis must be location specific?**

917 A. SBC Illinois' potential deployment analysis *is* "location specific." We selected specific
918 locations, and we addressed the factors that the FCC directs state commissions to
919 consider. The critical facts that show potential deployment at these locations – such as
920 the existence of nearby competitive fiber, the fact that competing providers have already
921 deployed loops to some of these locations (or to locations in the same fiber corridor), the
922 level of annual telecommunications spending of at least \$50,000 – are the same for all of
923 those locations, and we said so in our direct testimony. Mr. Ball is apparently suggesting
924 that a "location specific" analysis requires us to repeat the same facts over and over
925 again, 653 times: *e.g.* "location number 653, like location numbers 1 through 652, is
926 located in a densely served area within 300 feet of competitive fiber, and has a
927 telecommunications spend of at least \$50,000." Nothing in the FCC Rule requires such a
928 wasteful presentation; the CLECs are simply trying to add "make work" and needless
929 complexity to the case.

930

931 **Q. How do you respond to Mr. Ball's comment (pp. 44-46) that 300 feet is too far away**
932 **from existing CLEC fiber backbones and that SBC Illinois should have analyzed**
933 **whether CLECs have accessible splice points within 300 feet of a building?**

AT&T refers to as "very short". Joint CLEC Ex. 1.0, Attachment B, n. 3

934 A. As I mentioned above, AT&T elsewhere acknowledges that a 500 foot loop is “very
935 short” (Joint CLEC Ex. 1.0, Attachment B, n. 3), so I don’t believe that Mr. Ball can
936 seriously contend here that a 300 foot loop is too long. I also disagree with his claim that
937 SBC Illinois must analyze CLECs networks for accessible splice points. Mr. Sander
938 testifies that it is a reasonable and customary practice to design fiber facilities to have
939 many access points in order to minimize future expense and to maximize customer
940 response time. The Commission can comfortably rely on this evidence. If the Joint
941 CLECs have specific information about special conditions in their networks that create a
942 problem with access points, they should have presented “factually based concrete
943 evidence”, as Staff suggests. They did not.

944
945 **Q. Does SBC Illinois’ TELRIC study assume that conduit is available, as Mr. Ball**
946 **asserts at pp. 44-46?**

947 A. Mr. Wardin’s TELRIC study included the cost of constructing conduit, so the assumption
948 was that the CLEC would construct its own. There was no assumption that the CLEC
949 could obtain conduit from SBC Illinois, but if SBC Illinois has conduit available it can be
950 leased at very cheap rates. As Mr. Sander explains, SBC Illinois currently leases about
951 3,000,000 feet of conduit.

952
953 **Q. How do you respond to Mr. Anderson’s comment that CLECs will not build loops**
954 **without an existing order from the end user (p. 11)?**

955 A. I don’t know whether that is true or not, but even if it is I don’t see that as a barrier to
956 loop deployment. Mr. Sander testifies in his rebuttal that, barring no problems on the

customer end, a fiber lateral can be constructed to a building within 300 feet of a fiber backbone within 90 days or less and there is no reason why enterprise customers cannot sign contracts for telecommunications services more than 90 days in advance.

Q. Do you have any comments on Mr. Gordon's claim that the lack of deployment to a location suggests that there are barriers to deployment (p. 12)?

A. His observation is at odds with the fundamental nature of the FCC's potential deployment analysis. If, as he suggests, lack of actual deployment precludes a finding of non-impairment, then there would be no reason for a potential deployment analysis. Under Mr. Gordon's approach, ILECs would only be entitled to a finding of non-impairment in those cases where CLECs had actually deployed loop facilities and the FCC's potential deployment rules would be rendered null and void. Mr. Gordon cannot re-write the FCC's rules in this fashion.

IV. OTHER ISSUES

A. TRANSITION

Q. Mr. Ball (pp. 54-57) proposes a three-year transition for loops for which there is no impairment. Mr. Anderson (p. 16) proposes 12 months. What is your position?

A. If the Commission determines that the FCC's trigger tests and potential deployment analysis establish that there is no impairment at a location, then the finding should be effective from the date of the order. Mr. Ball argues that CLECs have long-term contracts and cannot absorb any increase from current UNE rates. This assumes a lot, i.e., that there are in fact long term contracts and that CLECs would no longer be

980 profitable at those locations without UNE pricing. There is no basis for the Commission
981 to make that conclusion, and even if there were it would not justify the continued
982 existence of UNE pricing for a network element that Commission has found is no longer
983 subject to an unbundling requirement. Mr. Anderson asks for additional time to
984 negotiate new prices or to make arrangements with other carriers. SBC Illinois should
985 not bear the burden of providing discount pricing while CLECs make these arrangements
986 because it removes any incentives to make them quickly. Of course, it will take the
987 Company time to revise any applicable tariffs and, more importantly, to amend its
988 relevant interconnection agreements.

989
990 **B. PROCEDURAL PROPOSALS**

991 **Q. Mr. Anderson proposes a “data verification” process (p. 15.) What is your**
992 **response?**

993 **A.** Mr. Anderson may be onto something here, but it is probably more appropriate for any
994 future TRO hearings. The evidentiary phase of this proceeding is almost over, and it is
995 somewhat late to be discussing changing the process. For future proceedings, SBC
996 Illinois would be willing to consider options for streamlining the data gathering and
997 analysis.

998
999 **V. CONCLUSION**

1000 **Q. Please summarize you testimony.**

1001 **A.** SBC Illinois presents a tightly focused case limited to non-impairment determinations at
1002 133 locations for the self-provisioning trigger, 89 locations for the wholesale trigger, and

1003 653 locations in downtown Chicago and Oak Brook for the potential deployment
1004 analysis. While the FCC's rules permit SBC Illinois to request a far more wide-ranging
1005 inquiry, SBC Illinois made a deliberate decision to limit the case so that the Commission
1006 so the parties could reasonably collect the required data and perform the required analysis
1007 in the limited time available.

1008
1009 SBC Illinois relied primarily on evidence produced by CLECs themselves in the course
1010 of discovery, but also presented evidence gleaned from SBC Illinois' files, and obtained
1011 from third party industry sources. This evidence shows that when the FCC's rules for
1012 making non-impairment determinations for DS1, DS3 and dark fiber loops are applied in
1013 a straight-forward fashion, SBC Illinois is entitled to a finding of non-impairment at all of
1014 the locations requested.

1015

1016 **Q. Does this conclude your testimony?**

1017 **A. Yes.**

| | Serving Wire Center | Enterprise Customer Location Address | City |
|----|---------------------|--------------------------------------|--------------------|
| 1 | ARLHILAH | 1305 E ALGONQUIN RD | ELK GROVE TOWNSHIP |
| 2 | BNSVILBV | 1 PIERCE PL | ITASCA |
| 3 | BNSVILBV | 2 PIERCE PL | ITASCA |
| 4 | BNSVILBV | 711 N EDGEWOOD AVE | WOOD DALE |
| 5 | CHCGILAL | 151 N MICHIGAN AVE | CHICAGO |
| 6 | CHCGILCA | 1 BANK ONE PLZ | CHICAGO |
| 7 | CHCGILCA | 350 E CERMAK RD | CHICAGO |
| 8 | CHCGILCL | 10 S CANAL ST | CHICAGO |
| 9 | CHCGILCL | 10 S RIVERSIDE PLZ | CHICAGO |
| 10 | CHCGILCL | 10 S WACKER DR | CHICAGO |
| 11 | CHCGILCL | 111 N CANAL ST | CHICAGO |
| 12 | CHCGILCL | 120 S RIVERSIDE PLZ | CHICAGO |
| 13 | CHCGILCL | 125 S WACKER DR | CHICAGO |
| 14 | CHCGILCL | 150 S WACKER DR | CHICAGO |
| 15 | CHCGILCL | 2 N RIVERSIDE PLZ | CHICAGO |
| 16 | CHCGILCL | 200 S WACKER DR | CHICAGO |
| 17 | CHCGILCL | 222 S RIVERSIDE PLZ | CHICAGO |
| 18 | CHCGILCL | 233 S WACKER DR | CHICAGO |
| 19 | CHCGILCL | 30 S WACKER DR | CHICAGO |
| 21 | CHCGILCL | 525 W MONROE ST | CHICAGO |
| 22 | CHCGILCL | 550 W JACKSON BLVD | CHICAGO |
| 23 | CHCGILCL | 555 W ADAMS ST | CHICAGO |
| 24 | CHCGILCL | 600 W MADISON ST | CHICAGO |
| 26 | CHCGILFR | 1 N FRANKLIN ST | CHICAGO |
| 27 | CHCGILFR | 1 N STATE ST | CHICAGO |
| 28 | CHCGILFR | 1 N WACKER DR | CHICAGO |
| 29 | CHCGILFR | 1 S WACKER DR | CHICAGO |
| 30 | CHCGILFR | 10 S DEARBORN ST | CHICAGO |
| 31 | CHCGILFR | 10 S LA SALLE ST | CHICAGO |
| 32 | CHCGILFR | 100 S WACKER DR | CHICAGO |
| 33 | CHCGILFR | 101 N WACKER DR | CHICAGO |
| 34 | CHCGILFR | 135 S LA SALLE ST | CHICAGO |
| 35 | CHCGILFR | 140 S DEARBORN ST | CHICAGO |
| 36 | CHCGILFR | 150 N MICHIGAN AVE | CHICAGO |
| 37 | CHCGILFR | 161 N CLARK ST | CHICAGO |
| 38 | CHCGILFR | 181 W MADISON ST | CHICAGO |
| 39 | CHCGILFR | 190 S LA SALLE ST | CHICAGO |
| 40 | CHCGILFR | 20 N WACKER DR | CHICAGO |
| 41 | CHCGILFR | 200 N LA SALLE ST | CHICAGO |
| 42 | CHCGILFR | 200 W ADAMS ST | CHICAGO |
| 43 | CHCGILFR | 200 W MADISON ST | CHICAGO |
| 44 | CHCGILFR | 208 S LA SALLE ST | CHICAGO |
| 45 | CHCGILFR | 209 S LA SALLE ST | CHICAGO |
| 46 | CHCGILFR | 221 N LA SALLE ST | CHICAGO |
| 47 | CHCGILFR | 222 W ADAMS ST | CHICAGO |
| 48 | CHCGILFR | 225 W WACKER DR | CHICAGO |
| 49 | CHCGILFR | 225 W WASHINGTON ST | CHICAGO |
| 50 | CHCGILFR | 227 W MONROE ST | CHICAGO |

| | Serving Wire Center | Enterprise Customer Location Address | City |
|-----|---------------------|--------------------------------------|---------|
| 51 | CHCGILFR | 230 S LA SALLE ST | CHICAGO |
| 52 | CHCGILFR | 230 W MONROE ST | CHICAGO |
| 53 | CHCGILFR | 30 N LA SALLE ST | CHICAGO |
| 54 | CHCGILFR | 311 W WASHINGTON ST | CHICAGO |
| 55 | CHCGILFR | 33 N DEARBORN ST | CHICAGO |
| 56 | CHCGILFR | 33 N LA SALLE ST | CHICAGO |
| 57 | CHCGILFR | 33 W MONROE ST | CHICAGO |
| 58 | CHCGILFR | 333 N MICHIGAN AVE | CHICAGO |
| 59 | CHCGILFR | 333 W WACKER DR | CHICAGO |
| 61 | CHCGILFR | 35 W WACKER DR | CHICAGO |
| 62 | CHCGILFR | 55 E MONROE ST | CHICAGO |
| 63 | CHCGILFR | 55 W MONROE ST | CHICAGO |
| 64 | CHCGILFR | 65 E WACKER PL | CHICAGO |
| 65 | CHCGILFR | 70 W MADISON ST | CHICAGO |
| 66 | CHCGILFR | 77 W WACKER DR | CHICAGO |
| 67 | CHCGILID | 330 N WABASH AVE | CHICAGO |
| 68 | CHCGILID | 350 N ORLEANS ST | CHICAGO |
| 69 | CHCGILID | 444 N MICHIGAN AVE | CHICAGO |
| 70 | CHCGILID | 455 N CITYFRONT PLAZA DR | CHICAGO |
| 71 | CHCGILID | 515 N STATE ST | CHICAGO |
| 72 | CHCGILID | 710 N LAKE SHORE DR | CHICAGO |
| 75 | CHCGILLR | 130 E RANDOLPH ST | CHICAGO |
| 76 | CHCGILLR | 155 N MICHIGAN AVE | CHICAGO |
| 77 | CHCGILLR | 180 N STETSON AVE | CHICAGO |
| 78 | CHCGILLR | 200 E RANDOLPH ST | CHICAGO |
| 79 | CHCGILLR | 205 N MICHIGAN AVE | CHICAGO |
| 80 | CHCGILLR | 225 N MICHIGAN AVE | CHICAGO |
| 81 | CHCGILLR | 233 N MICHIGAN AVE | CHICAGO |
| 82 | CHCGILLR | 303 E WACKER DR | CHICAGO |
| 83 | CHCGILMH | 11835 S O AVE | CHICAGO |
| 84 | CHCGILSU | 600 W CHICAGO AVE | CHICAGO |
| 85 | CHCGILSU | 630 N MCCLURG CT | CHICAGO |
| 86 | CHCGILWB | 111 W JACKSON BLVD | CHICAGO |
| 87 | CHCGILWB | 141 W JACKSON BLVD | CHICAGO |
| 88 | CHCGILWB | 175 W JACKSON BLVD | CHICAGO |
| 90 | CHCGILWB | 216 W JACKSON BLVD | CHICAGO |
| 91 | CHCGILWB | 223 W JACKSON BLVD | CHICAGO |
| 92 | CHCGILWB | 300 S WACKER DR | CHICAGO |
| 93 | CHCGILWB | 311 S WACKER DR | CHICAGO |
| 94 | CHCGILWB | 400 S LA SALLE ST | CHICAGO |
| 95 | CHCGILWB | 401 S LA SALLE ST | CHICAGO |
| 96 | CHCGILWB | 427 S LA SALLE ST | CHICAGO |
| 97 | CHCGILWB | 440 S LA SALLE ST | CHICAGO |
| 98 | CHCGILWB | 520 S FEDERAL ST | CHICAGO |
| 99 | CHCGILWB | 547 W JACKSON BLVD | CHICAGO |
| 100 | CHCGILWB | 555 W JACKSON BLVD | CHICAGO |
| 101 | CHCGILWB | 600 S FEDERAL ST | CHICAGO |
| 102 | CHCGILWB | 601 W POLK ST | CHICAGO |

| | Serving Wire Center | Enterprise Customer Location Address | City |
|-----|---------------------|--------------------------------------|-------------------|
| 103 | CHCGILWB | 700 S FEDERAL ST | CHICAGO |
| 104 | CHCGILWB | 717 S WELLS ST | CHICAGO |
| 105 | CHCGILWB | 725 S WELLS ST | CHICAGO |
| 107 | CHCGILWB | 85 W CONGRESS PKWY | CHICAGO |
| 108 | CHCGILWX | 53 W JACKSON BLVD | CHICAGO |
| 109 | CHMPIPCP | 304 S RANDOLPH (217) ST | CHAMPAIGN |
| 110 | DWGVILDG | 501 63RD ST | DOWNERS GROVE |
| 111 | DWGVILDG | 801 WARRENVILLE RD | LISLE |
| 112 | EGVGILEG | 1701 GOLF RD | ROLLING MEADOWS |
| 113 | EGVGILEG | 2425 BUSSE RD | ELK GROVE VILLAGE |
| 114 | EGVGILEG | 3820 GOLF RD | ROLLING MEADOWS |
| 115 | EMHRILET | 1808 SWIFT DR | OAK BROOK |
| 116 | HFESILWL | 1325 JONES RD | HOFFMAN ESTATES |
| 117 | LBRDILLM | 20 N MAIN ST | LOMBARD |
| 118 | LVPKILRN | 9934 N ALPINE RD | MACHESNEY PARK |
| 119 | NBRKILNB | 2305 SANDERS RD | NORTHBROOK |
| 120 | NBRKILNB | 3200 ARNOLD LN | NORTHBROOK |
| 121 | NBRKILNB | 450 LAKE COOK RD | DEERFIELD |
| 122 | OKBRILOA | 1 OAKBROOK TERRACE | OAKBROOK TERRACE |
| 123 | OKBRILOA | 1000 COMMERCE DR | OAK BROOK |
| 124 | OKBRILOA | 1111 W 22ND ST | OAK BROOK |
| 125 | OKBRILOA | 2115 BUTTERFIELD RD | OAK BROOK |
| 126 | OKBRILOA | 2809 BUTTERFIELD RD | OAK BROOK |
| 127 | OKBRILOA | 3003 BUTTERFIELD RD | OAK BROOK |
| 128 | OKBRILOA | 800 JORIE BLVD | OAK BROOK |
| 129 | OKBRILOA | 810 JORIE BLVD | OAK BROOK |
| 130 | PRRGILXL | 36 S FAIRVIEW AVE | PARK RIDGE |
| 131 | PRRGILXL | 8550 W BRYN MAWR AVE | CHICAGO |
| 132 | PRRGILXL | 8755 W HIGGINS RD | CHICAGO |
| 133 | RCFRILRT | 216 N MAIN ST | ROCKFORD |
| 134 | SCBGILCO | 1400 AMERICAN LN | SCHAUMBURG |
| 135 | SCBGILCO | 231 N MARTINGALE RD | SCHAUMBURG |
| 136 | SCBGILCO | 425 N MARTINGALE RD | SCHAUMBURG |
| 137 | SCBGILRS | 1299 E ALGONQUIN RD | SCHAUMBURG |
| 138 | SPFDILES | 1 W OLD STATE CAPITOL PLZ | SPRINGFIELD |
| 139 | SPFDILES | 620 S 5TH ST | SPRINGFIELD |
| 140 | WLNIGILWG | 540 ALLENDALE DR | WHEELING |

**ICC Docket No. 03-0596
2.1 Sparks Rebuttal Loop**

Attachment RLS-2

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ICC Docket No. 03-0596
2.1 Sparks Rebuttal Loop

Attachment RLS-3

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ICC Docket No. 03-0596
2.1 Sparks Rebuttal Loop

Attachment RLS-4

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| | Serving Wire Center | Enterprise Customer Location Address | City |
|----|---------------------|--------------------------------------|---------|
| 1 | BNSVILBV | 1 PIERCE PL | ITASCA |
| 2 | BNSVILBV | 2 PIERCE PL | ITASCA |
| 3 | CHCGILCA | 1 BANK ONE PLZ | CHICAGO |
| 4 | CHCGILCA | 350 E CERMAK RD | CHICAGO |
| 5 | CHCGILCL | 10 S RIVERSIDE PLZ | CHICAGO |
| 6 | CHCGILCL | 10 S WACKER DR | CHICAGO |
| 7 | CHCGILCL | 111 N CANAL ST | CHICAGO |
| 8 | CHCGILCL | 120 S RIVERSIDE PLZ | CHICAGO |
| 9 | CHCGILCL | 125 S WACKER DR | CHICAGO |
| 10 | CHCGILCL | 2 N RIVERSIDE PLZ | CHICAGO |
| 11 | CHCGILCL | 200 S WACKER DR | CHICAGO |
| 12 | CHCGILCL | 222 S RIVERSIDE PLZ | CHICAGO |
| 13 | CHCGILCL | 233 S WACKER DR | CHICAGO |
| 14 | CHCGILCL | 30 S WACKER DR | CHICAGO |
| 16 | CHCGILCL | 525 W MONROE ST | CHICAGO |
| 17 | CHCGILCL | 550 W JACKSON BLVD | CHICAGO |
| 18 | CHCGILCL | 555 W ADAMS ST | CHICAGO |
| 19 | CHCGILCL | 600 W MADISON ST | CHICAGO |
| 21 | CHCGILFR | 1 N FRANKLIN ST | CHICAGO |
| 22 | CHCGILFR | 1 N STATE ST | CHICAGO |
| 23 | CHCGILFR | 1 N WACKER DR | CHICAGO |
| 24 | CHCGILFR | 1 S WACKER DR | CHICAGO |
| 25 | CHCGILFR | 100 S WACKER DR | CHICAGO |
| 26 | CHCGILFR | 135 S LA SALLE ST | CHICAGO |
| 27 | CHCGILFR | 140 S DEARBORN ST | CHICAGO |
| 28 | CHCGILFR | 150 N MICHIGAN AVE | CHICAGO |
| 29 | CHCGILFR | 181 W MADISON ST | CHICAGO |
| 30 | CHCGILFR | 190 S LA SALLE ST | CHICAGO |
| 31 | CHCGILFR | 20 N WACKER DR | CHICAGO |
| 32 | CHCGILFR | 200 N LA SALLE ST | CHICAGO |
| 33 | CHCGILFR | 200 W ADAMS ST | CHICAGO |
| 34 | CHCGILFR | 200 W MADISON ST | CHICAGO |
| 35 | CHCGILFR | 208 S LA SALLE ST | CHICAGO |
| 36 | CHCGILFR | 209 S LA SALLE ST | CHICAGO |
| 37 | CHCGILFR | 221 N LA SALLE ST | CHICAGO |
| 38 | CHCGILFR | 222 W ADAMS ST | CHICAGO |
| 39 | CHCGILFR | 225 W WACKER DR | CHICAGO |
| 40 | CHCGILFR | 225 W WASHINGTON ST | CHICAGO |
| 41 | CHCGILFR | 227 W MONROE ST | CHICAGO |
| 42 | CHCGILFR | 230 S LA SALLE ST | CHICAGO |
| 43 | CHCGILFR | 230 W MONROE ST | CHICAGO |
| 44 | CHCGILFR | 30 N LA SALLE ST | CHICAGO |
| 45 | CHCGILFR | 33 N DEARBORN ST | CHICAGO |
| 46 | CHCGILFR | 33 N LA SALLE ST | CHICAGO |
| 47 | CHCGILFR | 33 W MONROE ST | CHICAGO |
| 48 | CHCGILFR | 333 W WACKER DR | CHICAGO |
| 50 | CHCGILFR | 55 E MONROE ST | CHICAGO |
| 51 | CHCGILFR | 55 W MONROE ST | CHICAGO |

| | Serving Wire Center | Enterprise Customer Location Address | City |
|----|---------------------|--------------------------------------|------------------|
| 52 | CHCGILFR | 70 W MADISON ST | CHICAGO |
| 53 | CHCGILFR | 77 W WACKER DR | CHICAGO |
| 54 | CHCGILID | 330 N WABASH AVE | CHICAGO |
| 55 | CHCGILID | 515 N STATE ST | CHICAGO |
| 56 | CHCGILLR | 130 E RANDOLPH ST | CHICAGO |
| 57 | CHCGILLR | 155 N MICHIGAN AVE | CHICAGO |
| 58 | CHCGILLR | 180 N STETSON AVE | CHICAGO |
| 59 | CHCGILLR | 205 N MICHIGAN AVE | CHICAGO |
| 60 | CHCGILLR | 225 N MICHIGAN AVE | CHICAGO |
| 61 | CHCGILLR | 303 E WACKER DR | CHICAGO |
| 62 | CHCGILSU | 630 N MCCLURG CT | CHICAGO |
| 63 | CHCGILWB | 111 W JACKSON BLVD | CHICAGO |
| 64 | CHCGILWB | 141 W JACKSON BLVD | CHICAGO |
| 65 | CHCGILWB | 175 W JACKSON BLVD | CHICAGO |
| 66 | CHCGILWB | 216 W JACKSON BLVD | CHICAGO |
| 67 | CHCGILWB | 223 W JACKSON BLVD | CHICAGO |
| 68 | CHCGILWB | 300 S WACKER DR | CHICAGO |
| 69 | CHCGILWB | 311 S WACKER DR | CHICAGO |
| 70 | CHCGILWB | 400 S LA SALLE ST | CHICAGO |
| 71 | CHCGILWB | 401 S LA SALLE ST | CHICAGO |
| 72 | CHCGILWB | 440 S LA SALLE ST | CHICAGO |
| 73 | CHCGILWB | 520 S FEDERAL ST | CHICAGO |
| 74 | CHCGILWB | 547 W JACKSON BLVD | CHICAGO |
| 75 | CHCGILWB | 555 W JACKSON BLVD | CHICAGO |
| 76 | CHCGILWB | 600 S FEDERAL ST | CHICAGO |
| 78 | CHCGILWB | 85 W CONGRESS PKWY | CHICAGO |
| 79 | DWGVILDG | 801 WARRENVILLE RD | LISLE |
| 80 | EGVGILEG | 1701 GOLF RD | ROLLING MEADOWS |
| 81 | HFESILWL | 1325 JONES RD | HOFFMAN ESTATES |
| 82 | LBRDILLM | 20 N MAIN ST | LOMBARD |
| 83 | NBRKILNB | 2305 SANDERS RD | NORTHBROOK |
| 84 | NBRKILNB | 3200 ARNOLD LN | NORTHBROOK |
| 85 | NBRKILNB | 450 LAKE COOK RD | DEERFIELD |
| 86 | No-Match | 1 OAKBROOK TERRACE | OAKBROOK TERRACE |
| 87 | OKBRILOA | 1000 COMMERCE DR | OAK BROOK |
| 88 | OKBRILOA | 1111 W 22ND ST | OAK BROOK |
| 89 | OKBRILOA | 2115 BUTTERFIELD RD | OAK BROOK |
| 90 | OKBRILOA | 2809 BUTTERFIELD RD | OAK BROOK |
| 91 | PRRGILXL | 36 S FAIRVIEW AVE | PARK RIDGE |
| 92 | PRRGILXL | 8755 W HIGGINS RD | CHICAGO |
| 93 | SCBGILRS | 1299 E ALGONQUIN RD | SCHAUMBURG |

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James R. Jackson, Jr.
JAMES R. JACKSON, JR., P.E.

XO
Not just talk **COMMUNICATIONS**



AT&T
LOCAL SERVICES

**MCI METRO ACCESS
TRANSMISSION SERVICES, LLC**



**Looking Glass
NETWORKS**

FIBER OPTIC CONDUIT INSTALLATION CONNECTION TO 100 SOUTH WACKER DRIVE CHICAGO, ILLINOIS

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1. TITLE, LEGEND, PROJECT BENCHMARK
- 2-3. GENERAL NOTES
4. PROJECT PLAN VIEW
5. PROJECT PROFILE A-A
6. STANDARD CONSTRUCTION DETAILS

LEGEND

| | |
|--|-----|
| EXISTING 4" CONDUIT | --- |
| EXISTING 4" WATER MAIN | --- |
| EXISTING 4" SEWER | --- |
| EXISTING 4" GAS | --- |
| EXISTING 4" ELECTRIC | --- |
| EXISTING 4" CABLE | --- |
| EXISTING 4" AIR CONDITIONING | --- |
| EXISTING 4" RADIANT HEATING | --- |
| EXISTING 4" FIBER OPTIC | --- |
| EXISTING 4" DRAINAGE | --- |
| EXISTING 4" VENT | --- |
| EXISTING 4" EXHAUST | --- |
| EXISTING 4" SLOPE | --- |
| EXISTING 4" ELEVATION | --- |
| EXISTING 4" DISTANCE | --- |
| EXISTING 4" AREA | --- |
| EXISTING 4" VOLUME | --- |
| EXISTING 4" WEIGHT | --- |
| EXISTING 4" LENGTH | --- |
| EXISTING 4" PERIMETER | --- |
| EXISTING 4" CIRCUMFERENCE | --- |
| EXISTING 4" DIAMETER | --- |
| EXISTING 4" RADIUS | --- |
| EXISTING 4" ANGLE | --- |
| EXISTING 4" BEARING | --- |
| EXISTING 4" DEPTH | --- |
| EXISTING 4" WIDTH | --- |
| EXISTING 4" HEIGHT | --- |
| EXISTING 4" THICKNESS | --- |
| EXISTING 4" DENSITY | --- |
| EXISTING 4" SPECIFIC GRAVITY | --- |
| EXISTING 4" MOISTURE CONTENT | --- |
| EXISTING 4" COMPRESSIVE STRENGTH | --- |
| EXISTING 4" TENSILE STRENGTH | --- |
| EXISTING 4" ELONGATION | --- |
| EXISTING 4" MODULUS OF ELASTICITY | --- |
| EXISTING 4" POISSON'S RATIO | --- |
| EXISTING 4" COEFFICIENT OF THERMAL EXPANSION | --- |
| EXISTING 4" COEFFICIENT OF FRICTION | --- |
| EXISTING 4" COEFFICIENT OF PERMEABILITY | --- |
| EXISTING 4" COEFFICIENT OF ABSORPTION | --- |
| EXISTING 4" COEFFICIENT OF REFRACTION | --- |
| EXISTING 4" COEFFICIENT OF TRANSMISSION | --- |
| EXISTING 4" COEFFICIENT OF REFLECTION | --- |
| EXISTING 4" COEFFICIENT OF TRANSMISSION LOSS | --- |
| EXISTING 4" COEFFICIENT OF REFLECTION LOSS | --- |
| EXISTING 4" COEFFICIENT OF TRANSMISSION LOSS COEFFICIENT | --- |
| EXISTING 4" COEFFICIENT OF REFLECTION LOSS COEFFICIENT | --- |
| EXISTING 4" COEFFICIENT OF TRANSMISSION LOSS COEFFICIENT | --- |
| EXISTING 4" COEFFICIENT OF REFLECTION LOSS COEFFICIENT | --- |

SITE LOCATION MAP



PROJECT BENCHMARK

1. CITY OF CHICAGO BENCHMARK NO. 2008 MARKED OUT IN CORNER OF
STONE WATER TOWER AT NORTHEAST CORNER OF ONE TRADER BUILDING
BENCHMARK IS IN CORNER IS ON SOUTH LINE OF WASHINGTON STREET
AND ABOUT ON THE WEST LINE OF WACKER DRIVE PROJECTED SOUTH
IS 4' 0" ABOVE WACKER DRIVE ELEVATION = 24.960

NOTE:
ONLY PRINTS WITH AN EMBOSSED SEAL ARE TO BE USED DURING CONSTRUCTION
AND CONSIDERED OFFICIAL COPIES. THESE PLANS ARE NOT TRANSFERABLE.

ENGINEER'S ESTIMATE OF MATERIALS

63 LINEAR FEET OF 4-4" PVC CONDUITS
6 LINEAR FEET OF 4-4" STEEL CONDUITS



EXPIRES 11-30-2003

SIGNATURE

DATE

ENGINEER:



HBK ENGINEERING, LLC

921 WEST VAN BUREN, SUITE 150
CHICAGO, IL 60607
PHONE: (312) 432-4070 FAX: (312) 432-0231
STATE OF ILLINOIS, DEPARTMENT OF PROFESSIONAL
REGULATION, LICENSE NO. 184-002308

CONTRACTOR:

john burns
construction company

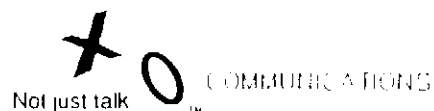
P.O. BOX 277
1000 AND PARK, 110000, 60611
TEL: (773) 479-1111
FAX: (773) 479-1111

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AT&T
LOCAL SERVICES

**MCI METRO ACCESS
TRANSMISSION SERVICES, LLC**



Looking Glass

**FIBER OPTIC CONDUIT INSTALLATION
CONNECTION TO 150 SOUTH WACKER DRIVE
CHICAGO, ILLINOIS**

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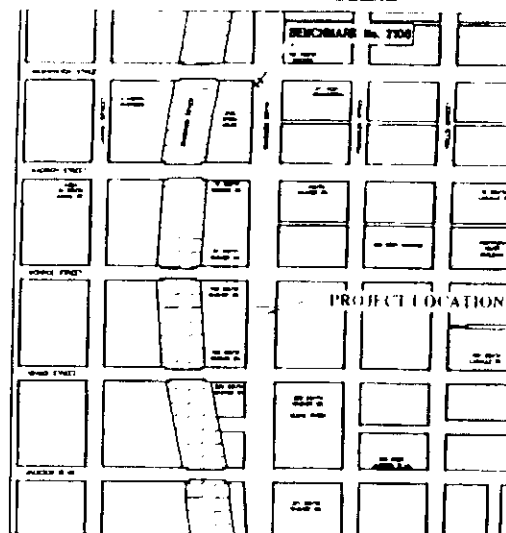
ENGINEER'S ESTIMATE OF MATERIALS

81 LINEAR FEET OF 4-4" PVC CONDUITS
1-4'X4'X4' COMMUNICATIONS MANHOLE

END

[illegible]

SITE LOCATION MAP



PROJECT BENCHMARK

STAY OF CHICAGO BENCHMARK NO. 7108 MARK CUT ON CORNER OF
STONE WATER TABLE AT NORTHEAST CORNER OF CIVIC THEATRE BUILDING
BENCHMARK IS ON CORNER IS ON SOUTH LINE OF WASHINGTON STREET
AND ABOUT ON THE WEST LINE OF BRACKER DRIVE PRODUCED SOUTH AND
IS 4 FT ABOVE WATER ELEV. = 24.960

CONFIRM FOR:



P(0) = 0.0000
P(1) = 0.0000
P(2) = 0.0000
P(3) = 0.0000

NOTE:
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SIGNATURE

DATE _____

ENGINEER:



IBK ENGINEERING, LLC

921 WEST VAN BUREN, SUITE 150
CHICAGO, IL 60607
PHONE: (312) 432-8076 FAX: (312) 432-8231
STATE OF ILLINOIS, DEPARTMENT OF PROFESSIONAL
REGULATION, LICENSE NO. 134-001300

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AT&T
wholesale
services

Overview of Global Wholesale Markets



AT&T

wholesale services

We understand that the current changes in the telecommunications industry worldwide present real concerns for you as a service provider. You need assurances that your traffic will not be disrupted by sudden and unforeseen circumstances, or inhibited by restricted service capabilities. Now, more than ever, you need a provider with the necessary depth, breadth and experience in global wholesale communications to reduce your concerns about service continuity and help you grow your business. In short, you want your business in "safe hands"

AT&T delivers the scale of a world-class network, the scope to design customer-defined solutions and the skill of globally deployed professionals. Our customer support team provides an integrated customer experience and leverages industry knowledge to ensure the viability of your business. AT&T combines the strengths of both traditional products and IP for the wholesale market. We offer a comprehensive portfolio of wholesale Voice, Data, and IP services.

We at AT&T would like you to know our commitment to the global wholesale market. Following is an introductory overview of our services.

AT&T Wholesale Services Portfolio

Your needs for connectivity are met by our comprehensive range of Voice Services, from the basics of outbound and inbound transit (including ISDN) and hubbing services up to advanced levels of carrier support for end-user calling cards, prepaid card services and collect calling.

AT&T Data Services offer a flexible portfolio of local, national and international data products and services always with high levels of technical support that meet your needs as your business reacts to market forces. AT&T International Private Line is available in 114 countries, in varying feature/functionality and speed levels. AT&T Global MIS provides far reaching IP coverage via 484 node cities in 52 countries. From Single Channel to T3 Services, AT&T Private Line Services offer an array of choices, all with high availability and performance, plus the security only Private Line can assure. AT&T also offers Local Channel Service and several Integrated Access Offers. For high-speed transport, high-level security and a network that can quickly scale to meet growth, AT&T offers flexibility around its industry leading high speed packet services - Frame Relay and ATM. Private Line, Frame Relay and ATM are available for local, intrastate or interstate communications.

At the industry level, AT&T has the resources to provide highly specialized carrier-specific support

Why

AT&T who provide the world with

Our strong heritage as well as financial health and stability offer a competitive advantage:

- AT&T is a leading carrier of minutes worldwide, transporting and terminating for traditional and emerging carriers, mobile networks and Internet Service Providers.
- A first-class infrastructure combined with established international agreements enables AT&T to carry minutes anywhere in the world.
- With our state-of-the-art technology and our powerful IP backbone network, we offer an extensive portfolio of communications solutions that provide world class quality, breadth, reach, security and reliability to businesses in the global wholesale market.
- Our management options can simplify your customers' networking tasks, impose predictable cost structures and enhance your expertise. AT&T gives you flexible management and access, including access redundancy options.

AT&T has the best set of capabilities in the industry serving the global communications needs of more than 4 million businesses in virtually every country and territory around the world.

Your Support Team

AT&T provides three levels of support for wholesale customers. A knowledgeable sales team of over 600 professionals is dedicated to the service provider market in the US and globally. Global customer care is available through five Operations Centers with over 350 in-country support specialists. Wholesale customer care is provided by four Customer Care Centers with over 400 Customer Care Specialists with US and international responsibilities. To focus these resources on the needs of your market, a product and offer team of over 110 experienced professionals guides the creation and integration of products and services crafted to serve your marketplace.

Solid Financials

AT&T stands apart from other industry players with a healthy cash flow and EBIT. Our solid finances enable us to continue investment in developing a strong service portfolio, and to deploy a new seamless, global network for meeting customers' needs.

AT&T

wholesale facts

Investing in Your Success

In 2002 alone, AT&T invested approximately \$300 million in global network expansion and approximately \$200 million in iGEMS. Annually, AT&T invests billions of dollars in:

- **Our People** - for ongoing training, tools and education
- **Our Processes** - for sales tools to increase efficiency and effectiveness
- **Our Technology** - for sophisticated e-Servicing, service management and monitoring tools

Heritage of Innovation

- Over 100 years of experience in the industry
- AT&T Labs breakthroughs for over 120 years
- First to establish 10-gigabit-per-second (OC192) service coast-to-coast in the U.S.
- First to deploy DWDM with 1,600 systems

Powerful Far-Reaching Network

- Over 61,000 route miles of fiber optic cable:
 - 45,000 miles carry long-distance traffic
 - 16,000 miles support local service
- Dial-up Internet access in 850 cities, 59 countries
- Connects over 230 countries and territories directly or via bilateral and alternate routes
- Partner in 300,000+ miles of undersea fiber-optic cable
- 400+ correspondents and suppliers
- 6,000+ nodes and 200,000 private line circuits
- AT&T carries more combined data, voice and Internet traffic than any other carrier in the U.S.: 675 trillion bytes (terabytes) of data and 300 million voice calls (average day) Canadian NPAs to points within the mainland United States.

For more information, contact your AT&T

Representative or visit www.att.com/wholesale.





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CUSTOMER CASE

ABOUT 10

AGENT PROGRAM

NEWS

XO™ Carrier Services

Overview

XO™ is committed to serving the needs of emerging and established carriers and service providers such as:

- ✓ Competitive Local Exchange Carrier (CLEC)
- ✓ Internet Service Provider (ISP)
- ✓ InterExchange Carrier (IXC)
- ✓ Incumbent Local Exchange Carrier (ILEC)
- ✓ Building Local Exchange Carrier (BLEC)
- ✓ Cable TV Provider
- ✓ Wireless Service Provider
- ✓ VOIP Service Provider
- ✓ Utility Telecom Division

This commitment, combined with our financial strength and vast network, means you can rely on XO to provide the communications solutions you need to stay competitive today... and further down the road.

XO understands that carriers and service providers need more than just bandwidth to satisfy their customers. So along with the generous bandwidth capabilities we offer, our products and services - coupled with dedicated customer service and technical support - make it possible for you to deliver what your customers need.

With assets that directly compete with those of the largest telecommunications service providers, XO serves carriers and service providers of various sizes. So no matter what your line of business, or product or service requirements, XO can handle a piece of your business... or all of it. We'll design a solution specifically for you, evaluating and delivering exactly what you need at a price you can afford.

[View All Carrier Service Products & Services](#)

See Also

- Learn More About the XO™ Network
- XO Available Markets

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Carrier Servi**

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XO™ Carrier Private Line

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XO Network Map

Overview

XO™ Carrier Private Line services provide high-speed, dedicated point-to-point connectivity for voice, data and video applications. Typically consisting of non-switched communications circuits and the required equipment to connect two or more locations, Carrier Private Line has long-haul and local circuits available in a variety of configurations. XO Carrier Private Line:

- ✓ Lets you select from IntraLATA, InterLATA and Interstate lines available in point-to-point or multipoint configurations
- ✓ Achieves 100% network availability with capacities from DS-1 to OC-n
- ✓ Offers state-of-the-art, self-healing fiber system for network recovery within milliseconds
- ✓ Uses our extensive intercity and metropolitan network that spans more than 400,000 route miles to 50 cities nationally

Features

- ✓ High-capacity bandwidth from DS-1 (1.5 Mbps) to DS-3 (45 Mbps) to OC-n
- ✓ 100% network availability
- ✓ SONET architecture
- ✓ Self-healing fiber system
- ✓ Proactive 24x7 network management and monitoring
- ✓ Customized circuits between locations
- ✓ Consolidated voice and data bill
- ✓ Flexible terms from 12 to 36 months

Pricing and Availability

Pricing and availability for XO Carrier Private Line Services varies. For more information, please [contact us online](#) or call XO Carrier Services toll-free today at 1.800.474.1763.

See Also

- ✓ [Learn more about the XO™ Network](#)
- ✓ [XO™ Wavelength Services](#)
- ✓ [XO Available Markets](#)



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XO Network

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Network Details



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XO™ Network

Overview

XO™ has a wealth of network assets that ensure we can handle your current needs and that we're well positioned for the convergence of voice and data IP services. XO has an OC-192 IP backbone with OC-12 uplinks in our markets and data centers; that means we have one of the highest capacity and scalable IP backbones in the industry, along with the highest levels of performance and reliability. A suite of world-class tools that facilitate the communication of customer information and continuous network monitoring set the XO network apart from its rivals.

Benefits

- ✓ **High capacity OC-192 IP backbone** provides speed, capacity and flexibility today while allowing XO to offer services that take advantage of future IP technological evolutions
- ✓ **Peering infrastructure to the Internet** with more than 100 private and public peering relationships, XO provides direct paths to all other major Network Service Providers so that your Internet traffic travels with peak speed
- ✓ **Dedicated Internet Access and DSL access POPs** in the

More Information



[Network Maps](#)



[Network Details](#)

XO Network At A Glance

- OC-192 backbone
- 2300+ on-network buildings
- Five data centers and a 24x7 network operations center
- 300-plus DSL access points
- Access to more than 100+ peering partners offering direct access to 85% of Internet traffic
- Total fiber: approximately 1,158,000 miles
- 34 Nortel DMS-500 switches for local and long distance voice
- Sonus Networks softswitches for handling next-generation traffic
- Fixed wireless licenses covering 95% of the top U.S. business markets

Contact XO

Sales

Call toll-free

1-800-233-88

[Click here to view our sales contact information.](#)

Support

Call toll-free

1-800-233-88

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XO Communications Expands Its Network Presence Adding 12 New Markets To Address Growing Demand Across The U.S.

12/16/03

Market Expansion Plan Allows XO to Reach New Customers and Further Address
the Multi-Location Needs of Growing Businesses

Reston, VA - XO Communications, Inc., a national broadband telecommunications services provider, announced today a network expansion plan that will add an additional 12 markets to its current 60 market footprint.

The expansion into the 12 new markets will be completed by the end of 2003. The additional markets will enable XO to provide dedicated Internet Access, Integrated Access, XOptions - the industry's first flat-rate bundled voice and data offering - and Private Line services to an expanded list of customer locations through the extended reach of the XO nationwide network. This network expansion enables XO to offer its broad selection of telecommunications services to a wider cast of small and medium-sized businesses and larger enterprises looking for superior 24x7 customer support.

"At a time when many companies are closing markets, XO is further expanding its network reach to support contiguous markets," said John Curran, Chief Technology Officer for XO Communications. "We have found untapped demand in these adjacent markets and have opted for a smart growth strategy that includes both network expansion and increased sales and agent channels. This approach ensures that our ongoing network optimization is in alignment with the individual growth of each market."

The XO network expansion plan includes the following 12 new markets: Tucson, AZ; Fresno, CA; Stockton, CA; Colorado Springs, CO; Jacksonville, FL; Sarasota, FL; St. Petersburg, FL; Tallahassee, FL; Pittsburgh, PA; Tacoma, WA; Richmond, VA and Youngstown, OH.

For additional information on the XO nationwide network, including detailed network maps, please visit <http://www.xo.com/about/network/>

About XO Communications

XO Communications is a leading broadband telecommunications services provider offering a complete set of telecommunications services, including, local and long distance voice, Internet access, Virtual Private Networking (VPN), Ethernet, Wavelength, Web Hosting and Integrated voice and data services. XO has assembled an unrivaled set of facilities-based broadband networks and Tier One Internet peering relationships in the United States. XO currently offers facilities-based broadband communications services in more than 60 markets throughout the United States.

FOR MORE INFORMATION CONTACT

Jenne Dee / XO Communications
Media and Industry Analysts
408-422-4287

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Wholesale

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Products & Services

Product Catalog (PCAT)

QwestLink™

Product Description

QwestLink provides carriers a cost-effective connection to the Qwest Macro Capacity® Fiber Network. Direct local access to the Qwest network enables wholesale customers to maximize advanced communications services, including dedicated Internet access (DIA), asynchronous transfer mode (ATM), frame relay, and dedicated private lines.

QwestLink is building metropolitan area networks in 25 cities across the country (excluding Qwest and BellSouth regions). From these networks, QwestLink will build fiber directly to customer premises. QwestLink will also be responsible for overall procurement and management of access services from ILECs, CLECs, and DLECs.

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